

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**ANNA SUI CORP.,**

**Plaintiff,**

-V.-

**FOREVER 21, INC., FOREVER 21 RETAIL, INC.,  
FOREVER 21 LOGISTICS, LLC,  
DO WON CHANG, JIN SOOK CHANG,  
GADZOOKS, INC., GERALD P. SZCZEPANSKI  
and JOHN DOES 1 to 20,**

**Defendants.**

## NOTICE OF MOTION

Upon the accompanying affirmation of Marya Lenn Yee, Esq. and memorandum of law, Plaintiff Anna Sui Corp., through its undersigned counsel, hereby moves the Court for an Order: (i) granting Plaintiff Expedited Discovery pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure requiring Defendants Forever 21, Inc., Forever 21 Retail, Inc., Forever 21 Logistics, LLC, Do Won Chang and Jin Sook Chang (collectively “Defendants”) to produce any and all documents identifying, concerning and/or relating to the fabric designs, together with all vendors for such fabric designs, for any women’s garments and related accessories Defendants have not yet made available for sale in Defendants’ retail or online establishments but which have been purchased, ordered, manufactured, created, designed, shipped, arranged for shipment and/or intended for sale by them in any retail establishment and/or online website; (ii) for the right to reply within five days of service of any opposition to this motion to address any new matters raised in opposition not addressed herein and (iii) for such other relief as the Court deems just and proper.

Dated: New York, New York  
December 10, 2007

DONOVAN & YEE LLP  
Attorneys for Plaintiff Anna Sui Corp.

By: /s/ MARYA LENN YEE  
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